

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

INGRID RAGANOVA,

Plaintiff(s),

UNITED AIRLINES, INC., UNITED  
AIRLINES HOLDINGS, INC., GARRETT  
FOSTER, STACY KATZ, & JOHN DOES 1-  
100,

Defendants.

Civil Action No.: 2:24-cv-09096

**CERTIFICATION OF SUZANNE M. CERRA, ESQ.**  
**IN SUPPORT OF NOTICE OF REMOVAL**

Suzanne M. Cerra, Esq., of full age, hereby certifies as follows:

1. I am an attorney at law of the State of New Jersey and Partner with the law firm of Nukk-Freeman & Cerra, P.C. As counsel for Defendant United Airlines, Inc. (“United”), I am fully familiar with the facts and circumstances herein.

2. In Plaintiff's Complaint (attached as **Exhibit A** to the Notice of Removal), Plaintiff alleges that she is a resident of the City of Fanwood in Union County, New Jersey. She does not provide a specific address in her Complaint. *Id.*

3. As set forth in the Declaration of Dorota Karpierz in Support of Notice of Removal, Plaintiff has never provided her employer (United Airlines) with an address located in New Jersey. Rather, the address Plaintiff most recently provided to United, as of August 2018, is in Ramada, Portugal.

4. We have conducted a good faith investigation into Plaintiff's allegation in the Complaint that she is "*currently residing in the City of Fanwood*", New Jersey, but have been

unable to locate any publicly available information that would indicate that this is an accurate statement.

I certify under penalty of perjury that the foregoing statements made by me are true and correct to the best of my knowledge.

NUKK-FREEMAN & CERRA, P.C.  
*Attorneys for Defendant*  
*United Airlines, Inc.*

BY: /s/ Suzanne M. Cerra  
Suzanne M. Cerra, Esq.  
Sheryl Reba, Esq.  
Jean Schroll Knapp, Esq.  
26 Main Street, Suite 202  
Chatham, New Jersey 07928  
[scerra@nfclegal.com](mailto:scerra@nfclegal.com)  
[sreba@nfclegal.com](mailto:sreba@nfclegal.com)  
[jschroll@nfclegal.com](mailto:jschroll@nfclegal.com)  
Telephone: (973) 665-9100  
Facsimile: (973) 665-9101

Dated: September 11, 2024